

Hon. Brian D. Lynch
Hearing Date: July 13, 2011
Hearing Time: 9:00 a.m.
Response Date:
Courtroom I: Tacoma

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

In re:)
Case No.: 09-49455)
WERNER E. KLEE and KATHLEEN J.)
KLEE,)
DECLARATION OF WERNER KLEE)
IN OPPOSITION TO AURORA'S MOTION)
FOR RELIEF FROM STAY ON 129)
ANDERSON HILL ROAD, CURTIS)
Debtors.)

WERNER KLEE, under penalty of perjury, declares as follows:

1. I am one of the debtors in possession in this case and can testify to all matters stated in this declaration should I be required to do so. I am over the age of 21 and competent to make this declaration.

2. In our bankruptcy schedules, we valued the property at \$285,000. We have been trying to sell the house through our realtor since before we filed our bankruptcy case. It has been listed with Chehalis Valley Realty at \$284,000.00, which I believe reflects fair market value.

3. An identical house (which was built by myself) at 133 Anderson Hill Road sold on July 16, 2009, for \$282,500.00. I believe this is the best "comparable sale" available to value 129 Anderson Hill Road. Both the houses at 133 Anderson Hill Road and 129 Anderson Hill

DECLARATION OF WERNER KLEE IN SUPPORT OF
DEBTOR'S RESPONSE

MANO, MCKERRICHER
& PAROUTAUD, INC., P.C.
P.O. BOX 1123
CHEHALIS, WA 98532
(360) 748-6641

1 Road are approximately 2,900 square feet, plus a carport and covered porch. Both houses were
2 built in 2006. 129 Anderson Hill Road is on a parcel of 6.12 acres, while 133 Anderson Hill
3 Road is on a parcel of 5.00 acres.

4 4. We have offered to make an adequate protection payment to Aurora in the amount
5 of \$800.00 per month beginning July 2011, plus pay the taxes and insurance as those become
6 due.

7 5. Aurora is adequately protected by a current equity cushion in this property. The
8 undersigned requests that the motion be denied and that an order be entered establishing an
9 adequate protection payment of \$800.00 per month, plus payment of taxes and insurance.

10 SIGNED and DATED this 30th day of June, 2011 at Chehalis, Washington.

11 /s/ Werner Klee

12 Werner Klee

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26 DECLARATION OF WERNER KLEE.